



7499 Pine Stake Road
Culpeper, VA 22701

Tel: 540-854-2037
Fax: 540-854-2002

September 30, 2016

Via FedEx

Mr. Luis A. Pizarro, Associate Director
Office of Remediation 3 LC20
Land and Chemicals Division
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103

Re: Submittal of the One-hundred and fourth (104th) Quarterly Air Monitoring Report Under RCRA RD&D Permit for Aerojet Rocketdyne's Orange County, Virginia Facility - EPA ID No. VAD981112618

Dear Mr. Pizarro:

This is the above-referenced one-hundred and fourth (104th) quarterly air monitoring report for the period June - August 2016, the one-hundred and fourth (104th) quarter of operation of Aerojet Rocketdyne's thermal treatment facility under the RCRA Research, Development, and Demonstration (RD&D) permit.

During this quarter, Aerojet Rocketdyne (AR) did not conduct any thermal treatment events (burns). As you are aware, Burn 323A was scheduled to be conducted on July 20, 2016; however, there was an unplanned ignition event during the loading of some waste solid propellant ingredients into the thermal treatment facility (TTF) that required implementation of AR's RCRA Contingency Plan. In response, AR applied for and received from VA-DEQ a temporary emergency permit on August 8 to implement emergency control methods for treatment and storage of the untreated solid propellant wastes that remained within the TTF from the incident. AR has subsequently treated the majority of the untreated solid propellant wastes from the incident, including a limited amount of potentially incompatible wastes that were suspect in the incident, which were segregated, relocated to another TTU, and treated under the emergency permit separately from any other waste material. Treatment of remaining wastes and cleanup continue in the affected TTU under the emergency permit.

Thermal treatment operations of routine production wastes are scheduled to re-start in early October in another TTU within the TTF that was not affected by the incident of July 20. Note that AR also applied for and received from VA-DEQ extensions to the 90-day waste accumulation period, the second of which provides until October 14 to treat the solid propellant wastes from routine production operations that have been accumulating onsite since the incident.

With the re-start of routine TTF operations, environmental monitoring in the vicinity of the TTF including air monitoring of burn events conducted under the RCRA RD&D permit, will also re-start at that time, and will be reported during the next quarterly air monitoring report.



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Mr. Luis A. Pizarro
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Should you have any questions or comments concerning any information in this quarterly air monitoring report, please contact me at 540-854-2037 or tim.holden@Rocket.com.

Sincerely,

AEROJET ROCKETDYNE, INC.
Virginia Operations

A handwritten signature in black ink that reads 'Timothy E. Holden'. The signature is written in a cursive, flowing style.

Timothy E. Holden
Sr. Manager – Safety, Health & Environment
Principal Investigator

ATT

cc: Leslie Romanchik, VDEQ/Waste Division
Richard Doucette, VDEQ/NRO
Brian Wheatley, Aerojet Rocketdyne
Clarkson Meredith, Versar



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CERTIFICATION LETTER

Dear Sir:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

The document certified by this letter is the "One-hundred and fourth (104th) Quarterly Air Monitoring Report Under RCRA RD&D Permit for Aerojet Rocketdyne, Inc.'s Orange County, Virginia Facility", RD&D Permit - EPA ID No. VAD981112618, dated September 30, 2016.

Sincerely,

AEROJET ROCKETDYNE, INC.

 9/30/16

(BRIAN WHEATLEY FOR...)

Chris W. Conley

Vice President of Safety, Health & Environment



Memo

June 1, 2015

To: Brian Wheatley

From: Chris W. Conley
Vice President, Environmental Health and Safety

Subject: Delegation of Authority

Copies: Brian Sweeney, Chris Cambria, William Hvidsten, Ron Felix, Tom Cadwell,
Tim Holden, David Rymph, Ron Sherer, Jan DeMeulenaere

Reference: (a) Memorandum, Chairman of the Board, Aerojet-General Corporation, to President, Aerojet-General Corporation, dated January 7, 1985
(b) Memorandum, Office of the President, Aerojet-General Corporation, to Vice President, Environmental Health and Safety, Aerojet-General Corporation, dated October 21, 2008

Pursuant to the delegation of authority established by reference (a) and (b), authority is further re-delegated to Brian Wheatley to execute all agreements and documents related to permit applications, reports or other information submitted to regulatory agencies on behalf of Aerojet Rocketdyne, Inc. and pertaining to its Environmental, Health and Safety functions at the Orange, VA facility.

This authority does not extend to documents expressly requiring a Aerojet Rocketdyne Holdings, Inc. Corporate Officer's signature and is subject to legal or other reviews and approvals required by Aerojet Rocketdyne Holdings, Inc. and Aerojet Rocketdyne Leadership Media. This supersedes all previous delegations that you may have received relative to signature authority on third party documents.

This authority may be re-delegated subject to such limitations as deemed advisable. Please make all subsequent delegations in duplicate originals, furnishing one to the addressee and one to the Aerojet Rocketdyne Legal Department.

A handwritten signature in blue ink, appearing to read 'C. Conley', is written over a horizontal line.

Chris W. Conley
Vice President
Environmental Health and Safety